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**August 11, 2022**

**Via ECF**

Hon. Valerie Figueredo, USMJ  
United States District Court, SDNY  
500 Pearl Street,  
New York, NY 10007-1312

**Re: Padilla Sandoval v. Yeshiva Tzoin Yosef Pupa Inc**  
**Case No. 21-CV-10417 (VF)**  
**Response to ECF No. 27**

Dear Magistrate-Judge Figueredo:

My firm represents plaintiff Hilma Padilla Sandoval ("Plaintiff") in the above-referenced action, and I respectfully write in response to defense counsel letter at ECF No. 27 which is somewhat odd in light of prior communications and the history of the case.

After I sent defense counsel a draft settlement agreement, defense counsel returned the draft with some changes – mainly extending the payment period to 45 days from 30 days. After some additional discussions, we agreed to accept the changes and on August 8, 2022 defense counsel emailed me as follows:

----- Forwarded message -----

From: **Josh Beldner** <[jbeldner@tiltonbeldner.com](mailto:jbeldner@tiltonbeldner.com)>  
Date: Mon, Aug 8, 2022 at 9:20 AM  
Subject: Re: Padilla Sandoval v. Yeshiva Tzion Yosef Pupa  
To: Ah Lg <[legal@abdulhassan.com](mailto:legal@abdulhassan.com)>  
Cc: Abdul K. Hassan, Esq. <[abdul@abdulhassan.com](mailto:abdul@abdulhassan.com)>, Stuart Weinberger <[stuart575@aol.com](mailto:stuart575@aol.com)>

Abdul,

If you send us the signed settlement agreement along with the consent to magistrate form, we will execute on our end.

Thanks,

Josh

Consistent with the above email, I sent defense counsel the settlement agreement signed by Plaintiff along with a consent to Magistrate form on August 8, 2022 – there was never any indication that the agreement was not ready for execution. In fact, the defense specifically stated in the above email that “we will execute on our end.” In the event the defense needs a few more day to execute the agreement, we anticipated that in the motion papers when we stated that “a fully executed copy will be provided to the Court once Defendant signs.”

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**cc: Defense Counsel via ECF**